

APR 16 2007

Application No. 10/803,255

Attorney Docket No. TEGI0012CIP

## REMARKS

1. **Claim Objections.** Applicant has corrected the dependency of Claims 3, 33,  
5 and 60, as noted by the Examiner. Accordingly, the claim objections with regard  
to these claims is deemed overcome.

With regard to Claim 56, the Examiner is referred to Figure 4 and the supporting  
text on page 16, lines 10-13, where Applicant teaches,

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"The memory 104 includes a combination of a temporary storage media, such as  
random access memory (RAM), and a permanent storage media, such as read-  
only memory (ROM), floppy disks, hard disks, or CD-ROMs. Memory 104  
contains all software routines to govern system operation. Preferably, the  
15 memory 104 contains an operating system 106, disambiguating software 108,  
and associated vocabulary modules 110 which are discussed above. Optionally,  
the memory 104 may contain one or more application programs 112, 114. The  
examples of the application programs include word processors, software  
dictionaries, and foreign language translators. Speed synthesis software may  
20 also be provided as an application program which allows the reduced keyboard  
disambiguating system to function as a communication aid."

In view of the foregoing explicit disclosure of a memory containing various types  
of programs, Applicant is at a loss to understand how the limitation of Claim 56,  
25 i.e. "a computer usable medium containing instructions in computer readable  
form" is not supported by the Specification. Accordingly, Applicant respectfully  
requests that the Examiner reconsider this rejection and withdraw same.

Applicant has corrected the status of Claims 35-56, 58, and 62-81. Accordingly,  
30 this objection is deemed overcome. In making this correction, Applicant has  
carefully checked the status of all other claims pending in the application and  
considers the status now to be correct for all claims currently presented.

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2. **35 USC 112.** Applicant notes the rejection of the 35 USC 112 is based upon the limitation "idiographic sequence database" present in independent Claims 1, 29, and 56. Applicant has revised this portion of Independent Claims 1, 29, and 56 to recite "a database associated with both stroke sequences and phonetic sequences, said database containing a set of phonetic sequences whose spellings correspond to said input sequence and a set of stroke sequences corresponding to the input sequence. . ." Support for this limitation is clearly found in Figure 5, and in the supporting text on page 11, lines 9-12. In view of these amendments to the claims, the rejection of 35 USC 112 is deemed overcome and withdrawal thereof is respectfully requested.

3. **35 USC 102.** In connection with the rejection of the claims under 35 USC 102 (e) as being anticipated by Williams, Applicant will focus on independent Claims 1, 29, and 56. In view of the allowability of these claims, as explained below, the claims which depend therefrom are considered to be allowable as well.

Applicant has reviewed Williams carefully and finds the Examiner's analysis to be erroneous for at least two reasons:

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The Examiner finds the "input method specific database. . ." of Applicant's independent claims to be anticipated by Williams' language model, for example as set forth in paragraphs 68-63 of Williams. Applicant is of the opinion that the Williams module is intended to be a plug-in module for a portable platform. Williams teaches the use of Japanese and Latin-based modules, as well as modules for the Chinese language. While Williams teaches three modes of operation for the Chinese language module, Williams is silent as to whether the module accepts and interprets keyboard entries in connection with such modes of operation simultaneously. Rather, Williams teaches that the user may select one of three modes of entry and the module of Williams interprets that entry based on the user-selected mode.

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In contrast to the manual selection of input mode within Williams, the invention herein provides an input method specific database. Such database is able to interpret both stroke and phonetic entries at the same time and produce an output responsive thereto. In Williams, a user must make a conscious effort to determine which mode is being input. The fact that Williams does not specifically teach that the mode of entry is independent of user selection means that Williams fails to teach the input method specific database claimed by Applicant. In particular, the language of Williams in paragraphs 59, 62, and 63 confirms that the user must consciously determine a mode of input. Thus, Williams teaches (paragraph 59),

"In the first input mode known as "Zi 8 Input," each key of a keypad represents a class of strokes by which one would render a Chinese character. The user enters the first written stroke by pressing a key corresponding to the class to which the stroke belongs. . ."

Further, at paragraph 62 Williams states,

"In the second input mode, known as "Han Yu Pinyin," the user enters the first letter of a character using the Latin alphabet. Language module 104 receives this data from parent appliance 102, either unambiguously or categorically as a group of two or more Latin letters. . ."

Finally, at paragraph 63, Williams teaches,

"In the third input mode, known as "BoPoMoFo," the user enters text in the matter described above with respect to "Han Yu Pinyin" except the Chinese National alphabet is used rather than the Latin alphabet to phonetically spell out intended Chinese characters."

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From the foregoing, it is clear that a device according to Williams is configured for a particular one of the three modes and is not adapted to operate in each of such modes simultaneously.

5 In contrast thereto, Applicant claims "an input method specific database containing at least one of a set of stroke sequences corresponding to input sequences and a set of phonetic sequences corresponding to input sequences.

10 Thus, Applicant clearly teaches the requirement of two input modalities to be active at the time of input. In contrast, Williams only teaches that the device is adapted to accept one of three modes of operation, but Williams is silent as to whether such modes of operation may be active at the same time. Accordingly, Williams is fatally defective in teaching this step of Applicant's claim.

15 More significantly, Applicant claims in connection with the database (as now defined in Applicant's revised claims) "each sequence representing a phrase comprising two or more idiographic characters." Williams is entirely silent on phrases. In his analysis of this aspect of Applicant's claim, the Examiner  
20 indicates that paragraph 58 implements both GB-2312 and BIG5 character sets. Applicant does not understand how this has anything to do with a sequence representing a phrase comprising two or more idiographic characters. Unique to the invention, is the ability to perform phrasal text entry. Such text entry increases the speed with which a user may enter a desired word. Williams  
25 teaches nothing of the sort.

As set forth in Applicant's previous Office Action Response, Applicant's phrasal entry system distinguishes the invention from the art of record. The same is true with Williams. The Examiner is referred to, for example, page 15 and thereafter,  
30 in which Applicant describes the advantages of a phrase selection system. Because Williams is entirely silent on Applicant's claim limitation of a "sequence representing a phrase comprising two or more idiographic characters," Williams

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is fatally defective as a reference with regard to anticipation of the claimed invention.

In view of the foregoing, Applicant respectfully requests that the Examiner  
5 carefully reconsider the rejections under 35 USC 102 (e) and withdraw same.

Should the Examiner find it helpful, he is encouraged to contact Applicant's Attorney, Michael A. Glenn, at (650) 474-8400.

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Respectfully Submitted,

  
Michael A. Glenn  
Reg. No. 30, 176

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Customer No.: 22,862